1. **Policy Statement**
   1.1 Indiana University – Purdue University Fort Wayne (IPFW) is concerned about protecting student privacy. This policy provides information on how IPFW secures student information and in what circumstances information sharing is warranted.

2. **Reason For Policy**
   2.1. To inform students about how their information is being handled and displayed and/or shared when deemed appropriate.
   2.2. This policy addresses procedures for handling public records requests as defined in the Indiana Access to Public Records Act. Indiana Access to Public Records Act. This policy details the procedures for handling requests for access.

3. **Who Should Know This Policy**
   3.1. IPFW Students, Faculty, and Staff

4. **Definitions**
   4.1. **IPFW** – Indiana University Purdue University Fort Wayne
   4.2. **FERPA** – Family Education Rights and Privacy Act
   4.3. **Education Records** – any record that is directly related to a student and maintained by the university.
   4.4. **Directory Information** – information that would generally be considered not harmful or an invasion of privacy if released. The following listed items are considered directory information by IPFW:
      4.4.1. Name
      4.4.2. E-mail address
      4.4.3. Address (local & home)
      4.4.4. Telephone number (local & home)
      4.4.5. College/ school and curriculum
      4.4.6. Enrollment status and credit hour load
      4.4.7. Dates of attendance
      4.4.8. Classification
      4.4.9. Receipt or non-receipt of a degree
      4.4.10. Academic awards received (dean’s list, honors students, etc.)
      4.4.11. Participation in officially recognized activities
      4.4.12. Sports photograph
4.4.13. Position, weight, and height of athletes

4.5. **Non-Directory Information- are protected by state or federal law, or are considered to be sensitive data by IPFW.** (examples but not limited to)

4.5.1. Social Security Number
4.5.2. University ID number
4.5.3. Birthdate
4.5.4. Grades/exam scores
4.5.5. GPA
4.5.6. Current class schedule
4.5.7. Parent name and address
4.5.8. Race/ethnicity
4.5.9. Gender
4.5.10. Country of citizenship
4.5.11. Religious affiliation
4.5.12. Disciplinary status
4.5.13. Marital status
4.5.14. Test scores (e.g., SAT, GRE, etc.)

5. **Student rights under FERPA**

5.1. The right to inspect and review their education records within 45 days of their request
5.2. The right to request an amendment to their education records
5.3. The right to consent to disclosures of personally identifiable information contained in their education records
5.4. The right to file a complaint with the U.S. Department of Education concerning alleged failures to comply with FERPA

6. **Public Information**

6.1. Directory information is published information that is openly available to the public.
6.2. A student may go to the Registrar and request their directory information be confidential.

7. **Public Posting of Grades**

7.1. The public posting of grades, either by the student’s name, institutional student identification number, or social security number is a violation of FERPA
7.2. Using an assigned random number that only the student and instructor know would be an appropriate way to post grades. Even then, the order of the posting should not be alphabetic
8. Education Records
8.1. Education records include any records in whatever medium (handwritten, e-mail, print, magnetic tape, film, diskette, etc...) that is in the possession of any school official. This includes transcripts or other records obtained from a school in which a student was previously enrolled.
8.2. Items that are not education records include:
   8.2.1. Sole possession records or private notes held by school officials that are not accessible or released to other personnel
   8.2.2. Law enforcement or campus security records that are solely for law enforcement purposed and maintained solely by the law enforcement unit
   8.2.3. Records relating solely to an individual’s employment by the institution that are not available for any other purpose
   8.2.4. Records relating to treatment provided by a physician, psychiatrist, psychologist or other recognized professional or paraprofessional and disclosed only to individuals providing treatment
   8.2.5. Records of an institution that contain only information about an individual obtained after that person is no longer a student, i.e., alumni records
   8.2.6. Grades on peer-graded papers that have not been collected and recorded

9. Letters of Recommendation
9.1. Statements made by a person making a recommendation that are made from that person’s personal observation or knowledge do not require a written release from the student who is the subject of the recommendation.
9.2. If personally identifiable information obtained from a student’s education record is included in a letter of recommendation (grades, GPA, etc...), the writer is required to obtain a signed release from the student which:
   9.2.1. Specifies the records that may be disclosed
   9.2.2. States the purpose of the disclosure
   9.2.3. Identifies the party or class of parties to whom the disclosure can be made
9.3. Since the letter of recommendation would be part of the student’s education record, the student has the right to read it – unless he/she has waived that right of access.

10. Health and Safety Exception
10.1. Institutions may take into consideration circumstances pertaining to the health and safety of a student or other individuals to disclose information from education records without a student’s consent.
10.2. If the institution determines there is "articulable and significant threat" to the health and safety of the student or others, information from education records can be released "to any person whose knowledge of the situation is necessary to protect" the health and safety of the student or other individuals.

11. FERPA and Parents' Access to their students' Education Records
   11.1. When a student reaches the age of 18 or begins attending a postsecondary institution at any age, FERPA rights transfer from the parent to the student.
   11.2. Parents may obtain non-directory information (grades, GPA, etc...) at the discretion of the institution if the student is a dependent per federal tax law.
   11.3. Parents may also have access to non-directory information by obtaining signed consent from their child.

12. Indiana Social Security Number Law
   12.1. Internal use of social security number information within the Purdue system for the purpose of conducting normal business is still permitted under that law.
   12.2. However, it is important to remember that Purdue data handling guidelines address the usage and methods of exchanging sensitive and restricted data, in addition to social security number information. See the following link http://www.purdue.edu/securepurdue/bestPractices/dataClass1.cfm

13. Related Information
   13.2. IPFW FERPA Policy http://new.ipfw.edu/offices/registrar/consumer/
   13.3. Purdue data handling guidelines http://www.purdue.edu/securepurdue/bestPractices/dataClass1.cfm

14. Contacts (Consult the phone directory, or contact the IT Services Helpdesk for the current name and number for these contacts)
   14.1. IPFW Office of the Registrar
   14.2. IT Security Officer
15. Policy Approval

The signers of this document agree that their responsible areas approve this policy.

IT Services Manager of Security, Policy, and Planning

2-14-14

Date

CIO & Director, IT Services

2-14-14

Date